AMENDMENTS TO THE DRAWINGS:

The attached sheet of drawing includes changes to Fig. 1. Specifically, Applicant has added reference numeral 302, which identifies the longitudinal axis referred to on page 14 of the specification.

Attachments: Replacement Sheet containing Fig. 1

REMARKS

I. Status and Disposition of the Claims

The Office Action[1] took the following actions:

1) Objected to the drawings under 37 C.F.R. § 1.83(a);

2) Rejected claim 1 under 35 U.S.C. § 112, second paragraph;

3) Rejected claims 1-12, 14-19 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2005/0259323 by Fukushima et al. (hereinafter "Fukushima") in view of U.S. Patent Publication No. 2002/0006213 by Doudnikov et al. (hereinafter "Doudnikov"); and

4) Rejected claim 13 under 35 U.S.C. § 103(a) as being unpatentable over Fukushima in view of Doudnikov, and further in view of U.S. Patent 5,617,490 by Kume (hereinafter "Kume").

II. Amendments to the Claims

Applicant amends claims 1, 9, 18, and 19, and cancels claims 2-8 and 10-13. The amendments are supported by Applicant's specification at, for example, page 14, lines 12-18, and originally filed claims 8 and 11. No new matter has been introduced by these amendments. Upon entry of the amendments, claims 1, 9, and 14-19, of which claims 1, 18, and 19 are independent, will be pending and under examination.

III. Response to Rejections and Objections

A. Objection to the Drawings

The Office Action, on page 2, objected to the drawings under 37 CFR 1.83(a) "because they fail to show the longitudinal axis 302 (pp. 14, line 22), and viewing zones 512 and 514 (pp.17, line 1-6) as described in the specification."

[1] The Office Action contains a number of statements reflecting characterizations of the cited art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

Applicant submits the attached replacement drawing sheet (containing Fig. 1) to add the missing label 302 which identifies the longitudinal axis. This identification of the longitudinal axis is supported by the specification at, for example, page 7, line 31 to page 8, line 3 and page 14, lines 19-22.

Regarding the objection to the disclosure of viewing zone 512, Applicant notes that viewing zone 512 is properly labeled in Fig. 7A. Further, regarding the objection to the disclosure of viewing zones 514, Applicant amends the specification at line 6 of page 17 to refer to "viewing zone 522," which is consistent with Fig. 7A, and not to "viewing zone 514," as was previously stated due to a typographical error.

Therefore, Applicant contends that, upon entry of the amendments, the drawings are compliant with 37 CFR 1.83(a), and requests withdrawal of the objection.

B. Claim Rejection Under 35 U.S.C. § 112

The Office Action, on page 3, rejected claim 1 under 35 U.S.C. § 112, ¶2. Specifically, the Office Action, on page 3, stated that

> claim 1 ... cites "a viewing zone adjusting unit that adjusts the viewing zone by shifting the viewing zone in a horizontal direction of the two-dimensional image display screen by shifting the parallax information disposed on each pixel of the two dimensional image display screen in the vertical direction by pixel.["] It is not clear whether adjusting viewing zone both directions - horizontally and vertically, or generating image by shifting vertically to show the view which could have been made by horizontal shift.

Claim 1, as amended, recites that "a viewing zone adjusting unit ... shifts the parallax information disposed on each pixel of the two-dimensional image display screen in the vertical direction by the shift amount." Applicant contends that amended claim 1 fully complies with 35 U.S.C. § 112, ¶2 and requests withdrawal of the above rejection.

C. Claim Rejection Under 35 U.S.C. § 103(a)

Citing 35 U.S.C. § 103(a), the Office Action rejected claims 1-12 and 14-19 on page 4, as being unpatentable over Fukushima in view of Doudnikov, and rejected claim 13 on page 15, as being unpatentable over Fukushima in view of Doudnikov and Kume. Applicant respectfully traverses these rejections because the Office Action has not properly resolved the Graham factual inquiries, the proper resolution of which is the requirement for establishing a framework for an objective obviousness analysis. See M.P.E.P. § 2141(II), citing to Graham v. John Deere Co., 383 U.S. 1, 148 USPQ 459 (1966), as reiterated by the U.S. Supreme Court in KSR International Co. v. Teleflex Inc., 550 U.S. 398, 82 USPQ2d 1385 (2007). Here, as discussed below, a prima facie case of obviousness has not been established, because the scope and content of the prior art have not been properly determined, nor have the differences between the claimed invention and the prior art been properly ascertained.

Claim 1

Fukushima and Doudnikov, whether considered alone or in combination, do not teach or suggest a three-dimensional image display device which comprises:

> a two-dimensional image display screen …;
>
> … the parallax information being presented in a horizontal direction of the two-dimensional image display screen;
>
> a viewing position displacement detecting unit that detects a viewing position displacement amount in the vertical direction of the two-dimensional image display screen … ; and
>
> a viewing zone adjusting unit that shifts the parallax information disposed on each pixel of the two-dimensional image display screen in the vertical direction by the shift amount,

as recited in claim 1.

In its rejection of claim 11 on pages 11-12, the Office action relied on Doudnikov for the disclosure of the above underlined features, asserting that Doudnikov

> detects the viewing position displacement amount in the vertical direction (vertical direction, paragraph 20) of the two-dimensional image display screen, and the viewing zone shift amount determining unit determines the shift amount of the viewing zone (same vertical displacement as viewing position displacement) based on the viewing position displacement amount in the vertical direction.

Applicant respectfully disagrees. The cited paragraph 0020 of Doudnikov uses the term "vertical" to merely state that "an angle between vertical and horizontal directions in the regenerated satellite image 28 is different from an angle of the regenerated image 23 of FIG. 2a." Nowhere does Doudnikov or Fukushima disclose that in a three-dimensional image display device, where "the parallax information [is] being presented in a horizontal direction of the two-dimensional image display screen," a viewing position displacement detecting unit detects "a viewing position displacement amount in the vertical direction," and a viewing zone adjusting unit "shifts the parallax information ... in the vertical direction," as recited in claim 1.

Applicant, thus, contends that, for at least the above reasons, claim 1 is patentable over the cited references.

Remaining Claims

Independent claims 18 and 19, although different from claim 1 in their scopes, each recite features similar to those discussed above in relation to claim 1. Moreover, each of claims 9 and 14-17 depends from, and thus incorporates features of, claim 1. Applicant, thus, contends that claims 9 and 14-19 are also patentable over the cited references.

Rejections of claims 2-8 and 10-13 are moot, because claims 2-8 and 10-13 have been cancelled.

IV. Conclusion

In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: July 23, 2010

By: _____

Reza Sadr, Ph.D.
Reg. No. 63,292
(617) 452-1653

Attachments: One (1) replacement drawing sheet, containing Fig. 1.